

Illinois Environmental Protection Agency
Bureau of Land #24
P.O. Box 19276
Springfield, IL 62794-9276

1999 Hazardous Waste Report

To Whom It May Concern:

Please change the name on the preprinted labels from Accurate Coatings Plant 1 & 2 to Accurate Dispersions which was submitted on the 1998 report. Also, the address for Plant 2 is 15530 LaSalle, 15630 appears on the preprinted label.

If you have nay questions, please call.

Sincerely,

Ronald Reinstein
Compliance Manager

RR/rr

CC: J. Valukas, C. Bergman, D. Dierwechter

ILR000017798

RECEIVED

DEC 13 2000


PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

2/18/00

RECEIVED

JAN 17 2001

RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Please refer to Section V, Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).		Notification of Regulated Waste Activity  United States Environmental Protection Agency		RECEIVED Date Received (For Official Use Only) DEC 18 2000	
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)					
<input type="checkbox"/> A. Initial Notification		<input checked="" type="checkbox"/> B. Subsequent Notification (Complete item C)		C. Installation's EPA ID Number 11LR000017798	
II. Name of Installation (Include company and specific site name) EASTMAN-ACCURATE DISPERSIONS					
III. Location of Installation (Physical address not P.O. Box or Route Number)					
Street 192 W 155TH ST.					
Street (Continued)					
City or Town SOUTH HOLLAND			State IL	Zip Code 60473	
County Code		County Name COOK			
IV. Installation Mailing Address (See instructions)					
Street or P.O. Box SAME					
City or Town			State	Zip Code	
V. Installation Contact (Person to be contacted regarding waste activities at site)					
Name (Last) REINSTEIN			Name (First) RON		
Job Title HSE MANAGER			Phone Number (Area Code and Number) 708-333-1337		
VI. Installation Contact Address (See instructions)					
A. Contact Address Location <input checked="" type="checkbox"/> Mailing <input type="checkbox"/>		B. Street or P.O. Box			
City or Town			State	Zip Code	
VII. Ownership (See instructions)					
A. Name of Installation's Legal Owner EASTMAN CHEMICAL COMPANY					
Street, P.O. Box, or Route Number P.O. BOX 511					
City or Town KINGSPORT			State TN	Zip Code 37662	
Phone Number (Area Code and Number) 423-229-2000		B. Land Type P	C. Owner Type P	D. Change of Owner Indicator Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
				Date Changed Month Day Year 01/01/2001	

updated
11LR000017798 CH 12/18/00 // 11LP010601110 inactive

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

1. Generator (See Instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes
- Mode of Transportation
☐ 1. Air
☐ 2. Rail
☒ 3. Highway
☐ 4. Water
☐ 5. Other - specify _____
- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
- ☐ 4. Exempt Boiler and/or Industrial Furnace
☐ a. Smelting, Melting, and Refining Furnace Exemption
☐ b. Small Quantity On-Site Burner Exemption
- ☐ 5. Underground Injection Control

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
☐ a. Transporter
☐ b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Processor
☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

- ☐ Large Quantity Handler of Universal Waste

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 F003	2 F005	3	4	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001) <input checked="" type="checkbox"/>	2. Corrosive (D002) <input type="checkbox"/>	3. Reactive (D003) <input type="checkbox"/>	4. Toxicity Characteristic <input type="checkbox"/>
1 2 3 4 D035			

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Ronald Reinster

Name and Official Title (Type or print)

Ronald Reinster, HSE Compliance Mgr.

Date Signed

12/15/00

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

2/21/96

RECEIVED
Form Approved OMB No. 2050-0028 Expires 9-30-96
GSA No. 0246-EPA-07

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Please refer to the instructions for filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

EPA Notification of Regulated Waste Activity
United States Environmental Protection Agency
Date Received (For Official Use Only)
APR 17 1998
PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division

822062150

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

<input type="checkbox"/> A. First Notification	<input checked="" type="checkbox"/> B. Subsequent Notification (Complete Item C)	C. Installation's EPA ID Number
		11LR000017798

II. Name of Installation (Include company and specific site name)

ACCURATE DISPERSIONS

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: Location update

192 WEST 155th Street

Street (Continued)

City or Town State Zip Code

SOUTH HOLLAND IL 60473-

County Code County Name

031 COOK

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

192 WEST 155th STREET

City or Town State Zip Code

SOUTH HOLLAND IL 60473-PMS

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last) (First)

REINSTEIN RONALD

Job Title Phone Number (Area Code and Number)

COMPLIANCE MGR 708-333-1337

VI. Installation Contact Address (See Instructions)

A. Contract Address Location Mailing Other B. Street or P.O. Box

☒ B

City or Town State Zip Code

VII. Ownership (See Instructions)

A. Name of installation's Legal Owner

MCWHORTER TECHNOLOGIES INC

Street, P.O. Box, or Route Number

400 EAST COTTAGE PLACE

City or Town State Zip Code

CARPENTERSVILLE IL 60110-

Phone Number (Area Code and Number) B. Land Type C. Owner Type D. Change of Owner Indicator (Date Changed)

847-551-3121 P F Yes X No 040198

EPA Form 8700-12 (Rev. 11-30-93) Previous edition is obsolete. Continued on Reverse

RECEIVED
MAY 29 1998

CHANGE OF OWNER/OPERATOR

RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA—REGION 5

RCRA ENTRY MAY 15 1998

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☒ a. Greater than 1000 kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; See Instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace
- ☐ 1. Smelter Defetral
- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
- ☐ a. Utility Boiler
- ☐ b. Industrial Boiler
- ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Process
- ☐ b. Re-refine

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contained in(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)


1 F003	2 F005	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
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X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature 	Name and Official Title (Type or print) Daryl Dierwetter Director, Environment, Health & Safety	Date Signed 4/1/98
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XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



McWHORTER Technologies

April 1, 1998

Illinois EPA
Bureau of Land - #24
Attn: Mr. Jim Pierce
1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276

RECEIVED

APR 15 1998

U. S. EPA, REGION V
SWB — PMS

RECEIVED

APR 02 1998

Dear Mr. Pierce:

On April 1, 1998, McWhorter Technologies, Inc. (MWT) acquired Accurate Coatings & Dispersions (ACD). During due diligence activities, we discovered that ACD had two (2) hazardous waste generator numbers for a single contiguous property. This occurred due to the following circumstances:

In 1986, ACD purchased it's first manufacturing facility and obtained a hazardous waste generator number - ILD010601110. In 1995, ACD purchased a parcel of property down the street from the original facility and built a second manufacturing facility. Because the two properties were not contiguous, ACD obtained a hazardous waste ID number for the new facility - ILR000017798. In mid-1996, ACD purchased the property between the two manufacturing facilities and the facilities are now considered one contiguous property.

MWT is requesting that ID number ILD010601110 be archived and that ID number ILR000017798 be revised to show that McWhorter Technologies, Inc. is the current owner of the facility. A revised Form 8700-12 (Notification of Hazardous Waste Activity) is attached.

Thank you for your assistance on this matter. Please contact me at (847) 551-3121 if you have any questions or need additional information.

Sincerely,

Daryl Dierwechter
Director - Environment, Health & Safety
McWhorter Technologies, Inc.

I kept the newer number and disregarded the old #. Cory

cc: Ronald Reinstein

RECEIVED

MAY 29 1998

RRRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U. S. EPA — REGION 5

RECEIVED

APR 14 1998

PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA — REGION 5



Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)



A. First Notification

B. Subsequent Notification
(Complete item C)

C. Installation's EPA ID Number

ILR0000017798

II. Name of Installation (Include company and specific site name)

ACCURATE COATINGS PLANT 2

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

15530 LASALLE STREET

Street (Continued)

City or Town

SOUTH HOLLAND

State

Zip Code

IL 60473-

County Code

County Name

03 COOK

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

192 WEST 155TH STREET

City or Town

SOUTH HOLLAND

State

Zip Code

IL 60473-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

REINSTEIN

(First)

RONALD

Job Title

COMPLIANCE SUP.

Phone Number (Area Code and Number)

708-333-1337

VI. Installation Contact Address (See Instructions)

A. Contract Address
Location Mailing Other

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of installation's Legal Owner

ACCURATE COATINGS & DIS. INC.

Street, P.O. Box, of Route Number

192 WEST 155TH STREET

City or Town

SOUTH HOLLAND

State

Zip Code

IL 60473-

Phone Number (Area Code and Number)

708-333-1337

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

☐

No

☐☐☐☐☐☐☐☐☐☐☐☐☐

(Date Changed)

Month

Day

Year

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see Instructions.
4. Hazardous Waste Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Boiler and/or Industrial Furnace
☐ 1. Smelter Deferral
☐ 2. Small Quantity Exemption
Indicate Type of Combustion Device(s)
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
☐ a. Utility Boiler
☐ b. Industrial Boiler
☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
☐ a. Transporter
☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Process
☐ b. Re-refine

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1 F003	2 F005	3	4	5	6
7	8	9	10	11	12

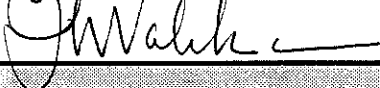
C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
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X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature



Name and Official Title (Type or print)

PRESIDENT

Date Signed

2/20/96

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

3/11/96
JAC



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

MAR 12 1988

Dear Notifier:

Enclosed you will find the United States Environmental Protection Agency (U.S. EPA) Identification (ID) number that has been assigned to your installation. You will find your twelve character ID number on the top portion of the enclosed notification form. This ID number acknowledges that you have filed a Notification of Regulated Waste Activity for the installation referenced on the notification form to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). This ID number must be included on all shipping manifest(s) for transporting hazardous wastes; on all correspondence; and on all reports required under Subtitle C of RCRA by the U.S. EPA and State agencies.

Please carefully review your status to determine whether the box you have checked is correct for your installation. If you checked Box 1A "Generator" you are a large generator producing over 1000 kg/mo (2200 lbs). Large generators are subject to all applicable regulations under Subtitle C of RCRA including the Annual/Biennial Report. If you determine Box 1A was checked in error, you can change your status to either a Small Quantity Generator (100-1000 kg/mo) or a Conditionally Exempt Generator (less than 100 kg/mo) by notifying the U.S. EPA in writing at the address at the top of this letter. Please indicate which generator category is correct for your installation.

Please note the U.S. EPA number is site-specific. If your installation changes locations, a new notification is required for a new ID number. If your installation has changed ownership, a subsequent notification must be filed to allow the new owner to use the ID number.

If the purpose of your notification is a one-time disposal for a clean-up, PCB removal, underground storage tank removal, etc., please notify U.S. EPA in writing upon completion of the project. U.S. EPA will deactivate the ID number at that time. Any other notification changes not mentioned can be sent to U.S. EPA by letter.

If you have any further questions regarding hazardous waste activity, please contact the Region V Notification Hotline at (312) 886-4001.

Sincerely,

Sharon J. Kiddon
RCRA Notifications Coordinator
Waste Management Division

STEDFORD PARK IL 60604

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box. •

U.S. EPA
77 W JACKSON BLVD LR-8J
CHICAGO, IL 60604
ATTN: GRACIELA SCAMBIATERRA

CA

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Received by (Please Print Clearly)	B. Date of Delivery 4/30/09
1. Article Addressed to:		C. Signature X <i>Graciela Scambiaterra</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Address
		D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Mr. Ron Reinstein Accurate Dispersions 192 West 155th Street South Holland, IL 60473		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Transfer from service label)		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
		7001 0320 0006 0184 9397	



Land and Chemicals Division

Type of Document: ☐ Inspection Report
☐ No Violation Letter and Inspection Report/Checklist
☒ **Notice of Violation and Inspection Report/Checklist**
☐ Return to Compliance (RTC) Letter
☐ Information Request
☐ Pre-Filing Notice and Opportunity to Confer
☐ State Notification of Enforcement Action
☐ Significant Non-Complier (SNC) Determination

Facility Name: Accurate Dispersions

Facility Location: 192 West 155th Street

City: South Holland

State: Illinois

U.S. EPA ID#: ILR 000 017 798

Assigned Staff: Graciela Scambiaterra Phone: 3-5103

NAME	SIGNATURE	DATE
Author (CS1 Staff)	<i>Graciela Scambiaterra</i>	4/22/09
Regional Counsel	<i>See email</i>	4/16/09
Section Chief	<i>Michael Johnston for US</i>	4-24-09
LCD Branch Chief	<i>William Harris</i>	4/27/09

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.




Tamara
Carnovsky/R5/USEPA/US

To

04/16/2009 11:36 AM

Subject Accurate NOV

History:

 This message has been replied to.

Gracie,

The Accurate NOV looks great! Does the first violation involve the 50-gallon tote of spent solvent that had the incorrect date on it?

Thanks, Tamara

Tamara Carnovsky
Associate Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd (C-14J)
Chicago, IL 60604

ph: 312.886.2250
fax: 312.886.0747

This message, including attachments, contains information that is confidential, and may be protected by attorney work-product, attorney-client or other applicable privileges. Further, this message, including attachments, may be exempt from disclosure by the U.S. EPA under applicable law. This message, including attachments, is intended to be conveyed only to the named recipient(s). If you received this message in error, or if you are not the intended recipient, please notify the sender listed above and delete the message from your system immediately. The unauthorized use, dissemination, distribution or reproduction of this message, including attachments, by unintended recipients is prohibited and may be unlawful.

Lorna Jereza/R5/USEPA/US

04/28/2009 11:39 AM

To Illinois EPA

cc Graciela Scambiaterra/R5/USEPA/US

bcc

Subject Enforcement Action Communication- Accurate Dispersions
(NOV)

This is to inform you that on April 30, 2009, U.S. EPA will send by certified mail, the attached notice of violation (NOV) to Accurate Dispersions located in South Holland, IL. The alledged violations were found during U.S. EPA's July 18, 2008 compliance evaluation inspection of Accurate Dispersions.

Contact: Graciela Scambiaterra (312) 353-5103



. Accurate-NOV.doc



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 27 2009

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ron Reinstein
Accurate Dispersions
192 West 155th Street
South Holland, Illinois 60473

Re: Notice of Violation
Accurate Dispersions
U.S. EPA ID. NO.: ILR 000 017 798

Dear Mr. Reinstein:

On July 18, 2008, a representative of the U.S. Environmental Protection Agency inspected the Accurate Dispersions facility ("Accurate," "facility" or "you") located in South Holland, Illinois. The purpose of the inspection was to evaluate Accurate's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on EPA's July 18, 2008, inspection that included personal observations and a review of records and information provided by Accurate, EPA finds that Accurate is engaged in the storage of hazardous waste without a hazardous waste storage permit, and is in violation of the requirements included in Title 35 of the Illinois Administrative Code (35 IAC), and Title 40 of the United States Code of Federal Regulations (40 CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, Accurate must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. Specifically, we find that Accurate is in noncompliance with the following conditions for a hazardous waste storage permit exemption set forth in paragraphs 1-2 below. On failing to comply with these conditions for a hazardous waste storage permit exemption, Accurate is also in violation of the hazardous waste storage permit requirements set forth in paragraph 3, below:

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must ensure the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. See, 35 IAC § 722.134(a)(2) [40 CFR § 262.34(a)(2)]. At the time of the inspection, Accurate had one container of hazardous waste without the accumulation start date written on it.

Accurate corrected the labeling discrepancy during the inspection.

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must mark their satellite containers (containers with no more than 55 gallons of hazardous waste at or near any point of generation where wastes initially accumulate) either with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(ii) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, Accurate had one satellite container of hazardous waste without the words "Hazardous Waste" or without other words that identify the contents of the container. Accurate corrected the labeling discrepancy during the inspection.

3. A large quantity generator of hazardous waste who accumulates hazardous waste on-site for 90 days or less, and who does not meet the conditions for a permit exemption of 35 IAC § 722.134(a) and (c)[40 CFR § 262.34(a) and (c)], is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC §§ 703.121(a) and (b), 703.180(c) and 705.121(a) [40 CFR §§ 270.1(c), 270.10(a) and (d)]. On failing to comply with the hazardous waste labeling requirements, Accurate became the owner or operator of a hazardous waste treatment, storage or disposal facility. Accurate failed to apply for and obtain a hazardous waste storage permit, and Accurate's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121(a) and (b), 703.180(c) and 705.121(a) [40 CFR §§ 270.1(c), 270.10(a) and (d)].

At this time, EPA is not requiring Accurate to submit an application for a RCRA storage permit, so long as it complies with the requirements found to have been violated during the July 18, 2008 inspection. According to Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection, and/or which you plan to take, to establish compliance with the above conditions and requirements.

However, please be advised that Accurate's compliance with the conditions and requirements described above will not relieve Accurate of its liability for the violations identified in this letter. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against Accurate for the violations identified in this letter.

You should submit your response to Graciela Scambiaterra, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Scambiaterra or my staff, at (312) 353-5103.

Sincerely,

A handwritten signature in cursive script, reading "Willie H. Harris".

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
LAND AND CHEMICALS DIVISION, RCRA BRANCH
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Accurate Dispersions

EPA ID No.: ILR 000 017 798

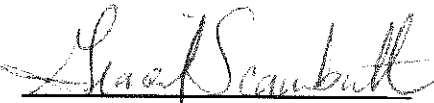
LOCATION ADDRESS: 192 West 155th Street
South Holland, Illinois 60473

NAICS CODE(s): 32551

DATE OF INSPECTION: July 18, 2008

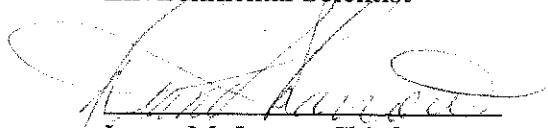
U.S. EPA INSPECTOR(s): Graciela Scambiaterra

PREPARED BY:


Graciela Scambiaterra
Environmental Scientist

15-Sep-08
Date

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

September 2008
Date

RCRA Compliance Evaluation Inspection

Introduction

I, Graciela Scambiaterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Accurate Dispersion (Accurate), located at 192 W. 155th Street, South Holland, Illinois. The Purpose of the CEI was to evaluate Accurate's compliance with certain provisions of the Resource Conservation and Recover Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste.

I arrived at Accurate on July at approximately 9am, identified myself and provided my credentials to the Accurate representative. I interviewed Ron Reinstein, Compliance Director, during the inspection. I provided the Small Business Resources Guide and the Sustainable Solutions pamphlet from Illinois Waste Management and Research Center to the representative. Photos are attached.

History and Interview

Accurate is a colorant manufacturer for solvent and water-based paints. These colorants are heavily pigmented and uses include industrial and architectural industries. Accurate has been operating at this location since 1986 and has been owned by Sherwin Williams since December 2003. They currently have approximately 220 employees and run a 24-hr operation on three shifts. According to the most recent data in EPA's RCRAInfo database, Accurate is listed as a large quantity generator (LQG) of hazardous waste.

Record Review

Training

I reviewed the facility's hazardous waste training and records. Ron Reinstein and Patrick Rogers, Accurate employee, provide annual training to facility personnel several times a year. I also reviewed Mr. Reinstein's training and noted that his experience included recent annual environmental compliance seminars through Sherwin Williams Corporation and approximately 30 years of total environmental experience.

Contingency Plan

I reviewed the facility's contingency plan. I observed that the plan was revised on 3/10/2008 and was titled *Emergency Action Plan*. This plan also included a Hazardous Waste Contingency Plan, which listed Ron Reinstein as the primary emergency coordinator and Ted Nowicki as the alternate.

Hazardous Waste Determinations

I reviewed the hazardous waste determinations for several waste streams, including solvent sludge, still bottoms, flammable solids and a non-hazardous filtercake.

Annual Reports

I reviewed the Hazardous Waste Annual Reports for years 2007, 2006 and 2005:

Hazardous Waste Annual Report								
Calendar Year:	2007	Date Sent:	2/22/08					
Certified Mail Receipt:	7273 93263159 (FedEx)							
Waste Streams Reported								
D001	D035	F003	F005					

Hazardous Waste Annual Report								
Calendar Year:	2006	Date Sent:	2/15/07					
Certified Mail Receipt:	7005 1820 0003 9678 0255							
Waste Streams Reported								
D001	D035	F003	F005					

Hazardous Waste Annual Report								
Calendar Year:	2005	Date Sent:	2/16/06					
Certified Mail Receipt:	7005 1820 0003 9676 1254							
Waste Streams Reported								
D001	D003	D035	F003	F005				

Manifests/LDRs

I reviewed the manifests for years 2008, 2007 and 2006. I did not observe any discrepancies.

Weekly Inspection Records

I reviewed the weekly inspection records for years 2008, 2007 and 2006. I did not observe any discrepancies.

Site Inspection

Plant 3, Building 4:

The Accurate site inspection began at the Quality Control Laboratory (QC Lab) for Plant 3, building 4. This lab supports production. I observed a satellite container of hazardous waste (see photo 1). Just outside of this lab, I observed a hazardous waste container of "solvent sludge" dated 7/18/08 (see photo 2).

The next area we looked at was the waste water treatment system (WWTS). The WWTS generates a non-hazardous filtercake (see photo 3). Waste wash water, generated from the water-based colorant production, is fed through the WWTS.

Plant 2, Building 3:

This plant supports production of both water and solvent-based colorants. Wash water generated in this area is also routed to the WWTS in the adjoining building (bldg 4). The solvent washings generated from this building are containerized and then taken to a distillation unit within the building. Some solvent is recovered from the distillation unit and re-used in their processes. A spent solvent is also generated from this solvent distillation unit. In this area, I observed a 250-gallon tote of spent solvent dated 3/10/08 (see photo 4). At this time, I notified Mr. Reinstein of the date on the container. Since it was the lunch hour and the Accurate employee responsible for the waste log had taken a lunch break, we decided to return to the area later. [At the end of the site inspection, we returned to this area, located the waste log, and Mr. Reinstein determined that this hazardous waste container should be dated 7/1/08. He showed me the waste log and he then proceeded to change the waste label and date (see photo 11)].

Also in the area, I observed several other spent solvent containers (see photos 5 & 6). All these containers were dated either 7/17/08 or 7/18/08.

Building 2-Warehouse:

We walked through the warehouse and I observed that only product was stored in this building.

Plant 1, Building 1:

The next area we looked at was the QC Lab for Plant 1. Here, I observed a satellite container of solvent rags (see photo 7). No label or markings were visible on the container. Mr. Reinstein alerted one of the lab employees of the discrepancy. By the time we walked back to the lab, a hazardous waste label had been placed on the container (see photo 10). Just outside of the lab, I observed a used solvent sludge container (see photo 8). The container was dated 7/17/08.

We took a walk around the production area within this building. Here, I observed a hazardous waste flammable solids container dated 7/18/08 (see photo 9). No other waste was observed.

This ended the Accurate site inspection.

Closing Conference

At this time, I thanked Mr. Reinstein for his time and explained to him that I was not making any compliance determinations at this time.

I completed the CEI at approximately 2:30pm.



Photo 1

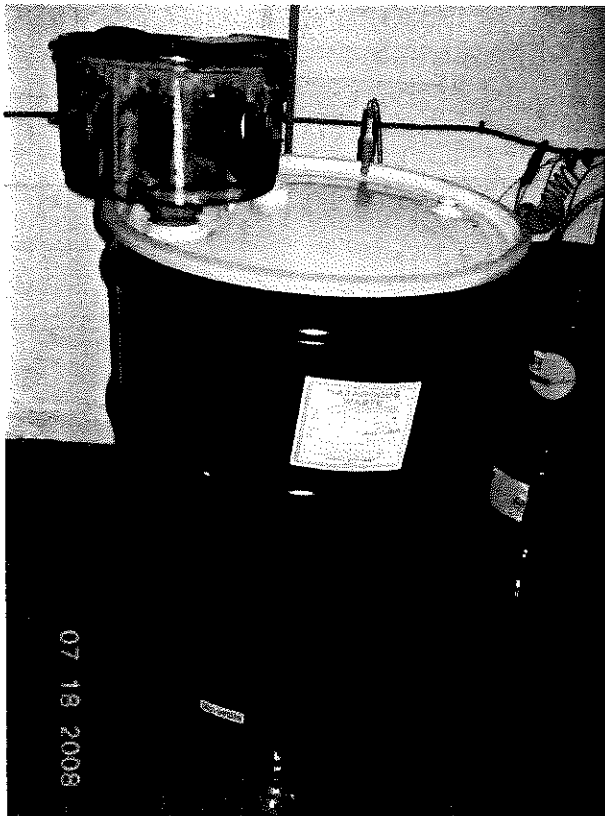


Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7

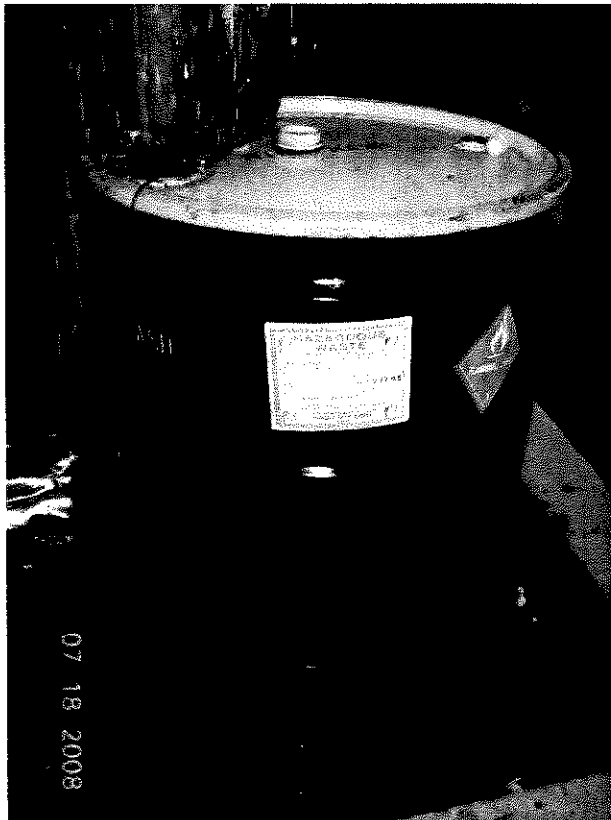


Photo 8



Photo 9



Photo 10

Harmful if swallowed or inhaled. Causes Irritation
Keep away from heat, sparks, and flame.
Avoid contact with eyes, skin, and clothing.
Avoid breathing vapor. Keep in tightly closed container.
Use in adequate ventilation

2

Tote #

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

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